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FARRA FOXDOG PRODUCTIONS, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEVY PRODUCTION GROUP, LLC, a
Nevada limited liability company,

Plaintiff,

v.

R&R PARTNERS, INC., a Nevada
corporation; FARRA FOXDOG
PRODUCTIONS, LLC; ROE
CORPORATIONS 1-10; JOHN DOES 11-20,

Defendants.

Case No.: 2:22-cv-01261-JAD-DJA

STIPULATION AND
ORDER TO EXTEND DISCOVERY
DEADLINES

(FIRST REQUEST)

As amended on page 4

Pursuant to Local Rules IA 6-1, LR 7-1 and 26-3, plaintiff Levy Production Group, LLC (“Plaintiff”) and defendants R&R Partners, Inc, (“R&R”) and Farra Foxdog Productions, LLC (“Farra Foxdog”) (together, “Defendants”) stipulate to extend the discovery deadlines set forth in the Stipulated Discovery Plan and Scheduling Order (ECF No. 21). The parties’ stipulation is supported by the following:

I. Discovery Completed to Date.

The parties have completed the following discovery:

- Plaintiff served its initial disclosures under Rule 26(a)(1) on March 3, 2023.
- Plaintiff served its initial document production on March 3, 2023.
- The parties held their Rule 26(f) conference on March 9, 2023.
- R&R served its initial disclosures under Rule 26(a)(1) on March 23, 2023.
- Farra Foxdog served its initial disclosures under Rule 26(a)(1) on April 3, 2023.
- Farra Foxdog served its initial document production on April 3, 2023.
- Plaintiff served its first set of Requests for Production to R&R on March 31, 2023.
- Plaintiff served its first set of Requests for Production to Farra Foxdog on March 31, 2023.
- R&R served its first set of Requests for Production and first set of Interrogatories to Plaintiff on April 4, 2024.
- Farra Foxdog responded to Plaintiff’s first set of Requests for Production and supplemented its document production on April 26, 2023.
- R&R responded to Plaintiff’s first set of Requests for Production on May 1, 2023.
- R&R served its initial document production on July 3, 2023.
- Plaintiff took the deposition of former employee of Defendant R&R Partners/non-party Stanzie Dunn on July 28, 2023.
- Plaintiff served its second set of Requests for Production to R&R on August 2, 2023.
- Plaintiff took the deposition of current employee of Defendant R&R Partners/non-party Don Turley on August 11, 2023.

II. Discovery that Remains to be Completed.

Plaintiff intends to take the depositions of the following fact witnesses:

- Yanick Dalhouse;
- Vaitari Anderson;
- Dennis Caldwell;
- Danita Collazo;
- Gina Nelson;
- Defendant R&R Partners, Inc.'s 30(b)(6) representatives;
- David Farra;
- James Farra;
- Matt Brown; and
- Las Vegas Convention and Visitors Authority 30(b)(6) representatives.

Nothing herein shall constitute a waiver by Defendants of the 10-deposition limit set forth under Fed. R. Civ. P. 30(a)(2).

Defendants intend to take the depositions of the following fact witnesses:

- Mike Levy;
- Jacquie Gray; and
- Plaintiff's 30(b)(6) witness(es).

The parties further anticipate the need to depose each parties' respective expert witnesses.

The parties reserve the right to seek additional discovery.

III. Reasons for Extension.

Good cause supports the requested extension. The parties have been working diligently to complete discovery and take depositions before the current deadline. Early deposition testimony reveals that Defendant R&R Partners, Inc. utilized a "team" of individuals on the projects at issue. As a result, the number of key, percipient witnesses whose depositions Plaintiff presently believes to be reasonably necessary, compounded by the fact that several of those witnesses are no longer employed by R&R, additional time is needed to accommodate the schedules of these non-party witnesses. Moreover, the parties have not yet had an opportunity to explore alternative dispute resolution (*e.g.*, mediation) but believe that this is something that should be explored after these depositions have been completed. Rather than waiting until the

current deadlines to request a revision of the case management order, the parties now jointly seek to extend the deadline for the close of discovery by approximately 60 days, from November 28, 2023 to January 30, 2024, and to adjust all case deadlines accordingly. A few of the deadlines below have been modified by more than 60 days to account for Thanksgiving, the winter holidays, and New Year. This request is made in good faith and not for purposes of delay, and the parties believe that the additional time requested will result in a narrowing the issues and reducing the time required for trial.

IV. Proposed Schedule for Completing all Remaining Discovery.

The parties propose the following extensions of deadlines:

Event	Current Date	Parties' Stipulated Proposal
Discovery cutoff	November 28, 2023	February 5, 2024 January 30, 2024
Deadline for amending pleadings/adding parties	August 30, 2023	No Change
Expert disclosures	September 29, 2023	December 8, 2023
Rebuttal expert disclosure	October 30, 2023	January 5, 2024 2023
Dispositive motion deadline	January 8, 2024	March 11, 2024
Joint pretrial order	February 7, 2024	April 10, 2024

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IT IS SO AGREED AND STIPULATED

Dated this 17th day of August 2023.

/s/ Bradley L. Boone

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R&R PARTNERS, INC.

IT IS SO ORDERED:

DATED: August 21, 2023



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE